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14 Plaintiff Pro Se

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

17 **VOICE INTERNATIONAL, INC., a**
18 **California corporation; DAVID**
19 **GROBER, an individual,**

20 **Plaintiffs,**

21 **v.**

22 **OPPENHEIMER CINE RENTAL,**
23 **LLC, et al.**

24 **Defendants**

25 **Case No.: 2:15-cv-08830-JAK(KS)**

26 **Plaintiffs' Reply to Defendant**
27 **Oceanic Production Equipment,**
28 **Ltd's Counterclaim**

1 deny the allegations therein.

2 12. Answering paragraph twelve of OPEL's Counterclaims, Plaintiffs
3 deny the allegations therein.

4 13. Answering paragraph thirteen of OPEL's Counterclaims, Plaintiffs
5 deny the allegations therein.

6 14. Answering paragraph fourteen of OPEL's Counterclaims, Plaintiffs
7 deny the allegations therein.

8 15. Answering paragraph fifteen of OPEL's Counterclaims, Plaintiffs are
9 without knowledge or information sufficient to form a belief as to the truth of the
10 allegations contained in said Paragraph, and on that basis deny the allegations
11 contained therein.

12 16. Answering paragraph sixteen of OPEL's Counterclaims, Plaintiffs
13 deny the allegations therein.

14 17. Answering paragraph seventeen of OPEL's Counterclaims, Plaintiffs
15 deny the allegations therein.

16 18. Answering paragraph eighteen of OPEL's Counterclaims, Plaintiffs
17 deny the allegations therein.

18 19. Answering paragraph nineteen of OPEL's Counterclaims, Plaintiffs
19 deny the allegations therein.

20 20. Answering paragraph twenty of OPEL's Counterclaims, Plaintiffs
21 deny the allegations therein.

22 21. Answering paragraph twenty-one of OPEL's Counterclaims, Plaintiffs
23 admit the allegations therein.

24 22. Answering paragraph twenty-two of OPEL's Counterclaims, Plaintiffs
25 deny the allegations therein.

26 **Request For Relief**

27 23. Answering paragraph twenty-three of OPEL's Counterclaims,
28 Plaintiffs deny the allegations therein.

1 WHEREFORE, Plaintiffs pray for relief as follows:

2 A. For a judgment that the patent, and each and every asserted claim thereof,
3 is valid, enforceable and infringed;

4 B. That OPEL's counterclaim be dismissed with prejudice, and no relief
5 granted to OPEL;

6 C. That pursuant to 35 U.S.C. § 285, and any other applicable authority,
7 OPEL be ordered to pay all of Plaintiff's reasonable attorneys' fees
8 incurred in defending against OPEL's counterclaims; and,

9 D. That Plaintiff be awarded such other relief as the Court deems just and
10 equitable.

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12 Date: March 8, 2018

Respectively submitted,

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14 LAUSON & TARVER LLP

15 /s/ robert lauson

16 Robert Lauson (175486)

17 *Attorneys for Voice International, Inc.*

18 /s/ david grober

19 David Grober

20 Plaintiff, in pro per
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